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June 18, 2020

VIA ECF

The Honorable James L. Cott
United States District Court
Southern District of New York
500 Pearl Street, Room 1360
New York, NY 10007

Re: *Doe et al. v. U.S. Immigration and Customs Enforcement et al.*,
No. 1:19-cv-08892-AJN-JLC

Dear Judge Cott:

We write on behalf of the parties in the above-captioned case in regard to the discovery dispute currently pending before the Court. *See* Dkt. Nos. 104, 108-111. As the Court is aware, Plaintiffs have challenged Defendants' withholding of certain documents (the "Challenged Attachments") on the claimed bases of attorney-client privilege and attorney work product.

The parties are grateful for the Court's guidance during the conference on June 8, 2020, and are pleased to report that we have made substantial progress in narrowing the dispute. The parties have now entered into a stipulation, pursuant to which Defendants will produce to Plaintiffs those of the Challenged Attachments listed in the appendix to that stipulation. The signed stipulation and appendix will be filed separately on the docket today as a "Stipulation and [Proposed] Order." The parties jointly and respectfully request that the Court enter the Stipulation and Order.

With respect to the remainder of the Challenged Attachments, Plaintiffs informed Defendants during a meet and confer on June 17, 2020, that they will not pursue their challenge as to all but four of the documents. The parties anticipate that the dispute as to three of those documents will be resolved when Defendants produce redacted versions pursuant to the

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stipulation. As to the one remaining document, the parties will inform the Court promptly if the dispute is resolved prior to the June 25, 2020 conference with the Court.

Respectfully submitted,

Date: New York, New York
June 18, 2020

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/s/ Jonathan I. Blackman

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